UNITED STATES DISTRICT COURT EASTERN DISTRICT OF PENNSYLVANIA

LEON WEINGRAD,) CASE NO. 2:25-CV-1843-MMB
Plaintiff,) JUDGE MICHAEL M. BAYLSON
V.)
EXACT CARE PHARMACY, LLC,)
Defendant.)
)

DEFENDANT EXACT CARE PHARMACY, LLC'S MOTION TO BIFURCATE DISCOVERY

Defendant Exact Care Pharmacy, LLC ("Exact Care") respectfully moves this Court for an order bifurcating discovery. Specifically, Exact Care requests that discovery on the threshold issue of Plaintiff Leon Weingrad's individual Telephone Consumer Protection Act ("TCPA") claims occur first before any class discovery as such bifurcation is warranted based on the specific facts of Plaintiff's claims and, moreover, serves the interests of judicial economy. The reasons in support of this Motion are more fully set forth in the accompanying Brief in Support. Counsel for Exact Care conferred with Plaintiff's counsel regarding Exact Care's request to bifurcate discovery and Plaintiff's counsel stated that Plaintiff will oppose Exact Care's request.

Respectfully submitted,

/s/ Sean P. Fahey

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing has been filed electronically on June 17, 2025, with the United States District Court for the Eastern District of Pennsylvania. Notice of the filing will be sent by email to all counsel by operation of the Court's electronic filing system, and all parties may access this filing through that system.

/s/ Sean P. Fahey
Sean P. Fahey

Counsel for Defendant Exact Care Pharmacy, LLC